

ORIGINAL

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LOGGED

FEB 07 2007

CLERK, U.S. DISTRICT COURT
DISTRICT OF HAWAII

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 08 2007

at 9 o'clock and 25 min. AM
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SILVER JOSE GALINDO,

Defendant.

) CR. NO. 04-00053 DAE

)

) DEFENDANT'S EX PARTE

) MOTION FOR AUTHORIZATION

) TO HIRE GOODENOW &

) ASSOCIATES TO INTERVIEW

) WITNESSES; DECLARATION

) OF COUNSEL; ORDER

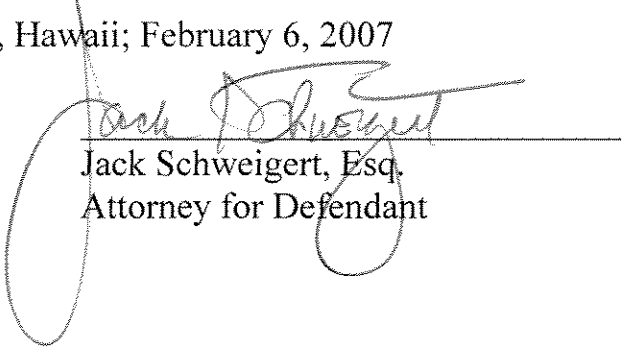
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DEFENDANT'S EX PARTE MOTION FOR AUTHORIZATION TO HIRE
GOODENOW & ASSOCIATES TO INTERVIEW WITNESSES

COMES NOW DEFENDANT SILVER JOSE GALINDO, by and through counsel, and moves this Honorable court *ex parte* to authorize the hire of Goodenow & Associates to interview witnesses in this case. By this motion, it is requested that Goodenow & Associates be paid up to a maximum of \$1,500, calculated at \$75 per hour.

This motion is made pursuant to 18 U.S.C. § 3006A(e)(1) and is supported by the attached declaration of counsel and the record and file.

DATED: Honolulu, Hawaii; February 6, 2007



Jack Schweigert, Esq.
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00053 DAE
)	
Plaintiff,)	DECLARATION OF JACK
)	SCHWEIGERT, ESQ.
vs.)	
)	
SILVER JOSE GALINDO,)	
)	
<u>Defendant.</u>)	

DECLARATION OF JACK SCHWEIGERT, ESQ.

I, Jack Schweigert, Esq., declare as follows:

1. I am Defendant Silver Jose Calindo's CJA counsel.
2. In that capacity, I am informed that there are several witnesses who the Government has brought to Hawaii to testify against my client as part of their cooperating agreements with the Government.
3. Based on this, I have contacted Joseph Cabrejos, lead investigator with the firm of Goodenow & Associates, who has agreed to interview all witnesses the Government may call to give testimony against my client, subject to court approval.
4. I estimate there are at least 5 witnesses who need to be interviewed, and probably more, so that I am requesting authority to hire the investigative firm of Goodenow & Associates to interview these witnesses, and to spend up to 20 hours of

time at a reduced hourly rate of \$75 per hour (the normal rate being \$125), for a total of \$1,500, and be paid pursuant to a CJA-21.

5. I believe it necessary to hire this investigative firm to adequately prepare my client's defense, and have used them in the past on other court appointed cases and found their work to be of good quality.

I declare under penalty of perjury for foregoing is true and correct.

Executed in Honolulu, Hawaii this 6th day of February 2007.



Declarant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00053 DAE
)	
Plaintiff,)	
)	ORDER
vs.)	
)	
SILVER JOSE GALINDO,)	
)	
Defendant.)	

ORDER

Defendant's motion for authorization to hire the investigative firm of Goodenow & Associates to interview witnesses was presented this court *ex parte*. The Court, having considered the motion, finds the requisite good cause exists for granting the motion. NOW THEREFORE,

IT IS HEREBY ORDERED that Defendant's counsel is authorized to hire Goodenow & Associates to interview witnesses and be paid up to \$1,500 for professional services rendered, calculated at the rate of \$75 per hour, subject to further order of the court.

IT IS FURTHER ORDERED that Goodenow & Associates will be paid via a CJA-21 form for professional services rendered.

DATED: Honolulu, Hawaii; 27. 2007


JUDGE OF THE ABOVE-ENTITLED COURT